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September 9, 2019

Allen County Sheriff
715 S. Calhoun St.
Courthouse, Room 101
Fort Wayne, Indiana 46802

Re: **NOTICE OF TORT CLAIM**

Sheriff David Gladieux:

This is a Tort Claim Notice of Jermayne L. Williams. It is also a Request for preservation of records pursuant to the Indiana to access to public records act.

Date, Time, Place of Loss:

Between April 15, 2016 and April 18, 2016, at the Allen County Jail, both the sally port area as well as I and J blocks.

Circumstances Which Brought About the Loss:

On or May 8, 2019 Jermayne Williams was taken from the nursing area into the shower room and told to put on a suicide prevention suit, although the inmate was not suicidal. At no time had Williams made any statements from which suicide or a threat of suicide could be inferred. The inmate was told "you either put it on, or we will put it on you." After cuffing the inmate, and with him facing the wall, Officer Apps began striking Williams in his left back area. At one point, an Officer Sanderson reported to the shower room area, having heard a Call 15, and observed Officer Apps, Officer Poor and Officer Stump on the ground with Williams, whereupon Officer Sanderson observed Officer Stump deliver a closed-fist punch to Williams' facial area. Officer Sanderson reported that he pulled Officer Stump off of Williams at that point. Williams suffered a chipped and broken tooth as a result of the altercation. Williams was bleeding from his mouth, and having difficulty breathing, and Officer Sanderson repositioned Williams face so that he would not get blood on himself if Williams aspirated. Once Williams had calmed down, Officer Sanderson assisted the other officers to get Williams to his feet so that he could be evaluated by a nurse. The nurse indicated that Williams had a broken tooth from the incident. Despite requests for pain medication, Williams did not receive mediation for his tooth pain, or a dental evaluation for the broken tooth. On or about May 31, 2019 Williams received what he thought was his requested meds, only to discover he had been given meds that belonged to a

neighboring inmate. Those meds made him nauseous, caused his heart to race, and did nothing for his tooth pain. Despite asking repeatedly, Williams was never told what it was he ingested erroneously, nor was he provided with even an aspirin to deal with the pain from his broken tooth.

Names of All Persons Involved:

Jermayne L. Williams, Complainant; Officer Stump; Officer Apps; Officer Poor; Officer Sanderson; Nurse who administered meds on or about 5/31/19 – Name Unknown.

Damages/Injuries Sustained:

Physical pain, mental suffering, lack of adequate medical care, denial of appropriate medications, suffering excessive force and cruel and unusual punishment.

The Amount of the Damages Sought:

The Claimant demands relief in an amount consistent with the evidence. Not all of the facts and evidence are known at this time but Complainant contends that he is owed compensatory damages of \$50,000 dollars, punitive damages of \$25,000 dollars, as well as reasonable attorney's fees and costs.

Residence of Claimant at the Time of the Loss and at the Time of the Filing of This Notice:

Complainants residence at the time was the Allen County Jail located at 417 South Calhoun St, Fort Wayne, IN 46802. Complainant's present and current address is 6619 Laurelwood Cove, Fort Wayne IN 46835.

Very truly yours,

CHRISTOPHER C. MYERS & ASSOCIATES



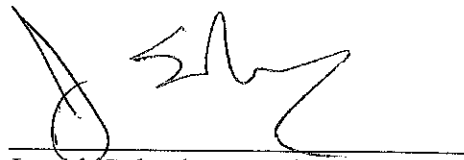
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CERTIFICATE OF HAND DELIVERY

The undersigned hereby swears and affirms that a true and correct copy of the above Tort Claim Notice was sent by U.S. Mail, Certified, Return Receipt requested on this 9th day of September, 2019, addressed to:

Allen County Sheriff
715 S. Calhoun St.
Courthouse, Room 101
Fort Wayne, Indiana 46802

A handwritten signature in black ink, appearing to read 'Joseph Soboslay', is written over a horizontal line.

Joseph Soboslay, Paralegal
Christopher C. Myers & Associates
809 South Calhoun Street, Suite 400
Fort Wayne, Indiana 46802